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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Gilberto Quiroz,

Plaintiff,

v.

United States Postal Service; DOES I
through XX, inclusive and ROE
BUSINESS ENTITIES I through XX,
inclusive,

Defendant.

Case No. 2:24-cv-00706-RFB-MDC

**Stipulation and Order to Extend Time to
File a Response to Plaintiff's Complaint**

(First Request)

Plaintiff Gilberto Quiroz and Federal Defendant United States Postal Service ("USPS"), through undersigned counsel, hereby submit this stipulation to extend the date to file a responsive pleading.

Plaintiff filed his Complaint on April 11, 2024.

Federal Defendant was served with Plaintiff's Complaint on April 22, 2024.

The current deadline for Federal Defendant to respond to Plaintiffs' Complaint is June 21, 2024.

Plaintiff and Federal Defendant, through undersigned counsel, agree and stipulate that Federal Defendant's time to respond to the Plaintiff's Complaint be extended to **July 22, 2024**. This is the first request for an extension of time.

The extension of time is necessary because undersigned counsel is awaiting essential information from the USPS to properly evaluate and respond to the allegations in

1 Plaintiff's complaint. The reception of that information has been delayed because of heavy
2 workload and staffing shortages in the USPS.

3 Therefore, the parties request that the Court extend the deadline for Federal
4 Defendant to answer or otherwise respond to Plaintiff's Complaint to July 22, 2024.

5 This stipulated request is filed in good faith and not for the purposes of undue delay.

6 Respectfully submitted this 21st day of June 2024.

7 LADAH LAW FIRM

U.S. ATTORNEY'S OFFICE

8 JASON M. FRIERSON
United States Attorney

9 /s/ Anthony L. Ashby, Esq.
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Attorneys for the Federal Defendant

13 *Attorneys for Plaintiff*

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15 **IT IS SO ORDERED:**

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18 **Hon. Maximiliano D. Couvillier III**

19 **UNITED STATES MAGISTRATE JUDGE**

20 **DATED: 6/24/24**
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